

## Section 1. Registration Information

### Source Identification

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Facility Name:	Yuma Express Cooling, LLC
Parent Company #1 Name:	
Parent Company #2 Name:	

### Submission and Acceptance

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Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	2009 RMP Update Submission
Receipt Date:	12-Jun-2009
Postmark Date:	10-Jun-2009
Next Due Date:	10-Jun-2014
Completeness Check Date:	10-Mar-2014
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

### Facility Identification

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EPA Facility Identifier:	1000 0012 4509
Other EPA Systems Facility ID:	

### Dun and Bradstreet Numbers (DUNS)

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Facility DUNS:	148858426
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

### Facility Location Address

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Street 1:	2551 South Ave 4E
Street 2:	
City:	Yuma
State:	ARIZONA
ZIP:	85365
ZIP4:	
County:	YUMA

### Facility Latitude and Longitude

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Latitude (decimal):	32.682778
Longitude (decimal):	-114.563889
Lat/Long Method:	Interpolation - Photo
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	24000

## Owner or Operator

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Operator Name:	Yuma Express Cooling, LLC
Operator Phone:	(928) 726-0478

## Mailing Address

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Operator Street 1:	C/O WPS
Operator Street 2:	2575 S. Avenue 4E
Operator City:	Yuma
Operator State:	ARIZONA
Operator ZIP:	85365
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

## Name and title of person or position responsible for Part 68 (RMP) Implementation

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RMP Name of Person:	Gary Elk
RMP Title of Person or Position:	WPS Compliance Manager
RMP E-mail Address:	garye@westernprecooling.com

## Emergency Contact

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Emergency Contact Name:	Gary Elk
Emergency Contact Title:	WPS Compliance Manager
Emergency Contact Phone:	(928) 726-0478
Emergency Contact 24-Hour Phone:	(928) 726-0478
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	garye@westernprecooling.com

## Other Points of Contact

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Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

## Local Emergency Planning Committee

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LEPC:	Yuma County LEPC
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## Full Time Equivalent Employees

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Number of Full Time Employees (FTE) on Site:	4
FTE Claimed as CBI:	

## Covered By

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OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	
Air Operating Permit ID:	

## OSHA Ranking

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OSHA Star or Merit Ranking:

## Last Safety Inspection

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Last Safety Inspection (By an External Agency) Date:	14-Nov-2006
Last Safety Inspection Performed By an External Agency:	Fire Department

## Predictive Filing

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Did this RMP involve predictive filing?:

## Preparer Information

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Preparer Name:	The Cloud Company / Ray Cloud
Preparer Phone:	(805) 025-0265
Preparer Street 1:	529 Calle Grande
Preparer Street 2:	
Preparer City:	Santa Maria
Preparer State:	CALIFORNIA
Preparer ZIP:	93455
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

## Confidential Business Information (CBI)

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CBI Claimed:  
Substantiation Provided:  
Unsanitized RMP Provided:

## Reportable Accidents

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Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
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## Process Chemicals

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Process ID:	79640
Description:	Refrigeration System
Process Chemical ID:	106217
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	29355
CBI Claimed:	
Flammable/Toxic:	Toxic

## Process NAICS

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Process ID:	79640
Process NAICS ID:	81581
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

## Section 2. Toxics: Worst Case

Toxic Worst ID: 51844

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Percent Weight:

Physical State:

Model Used:

Release Duration (mins):

Wind Speed (m/sec):

Atmospheric Stability Class:

Topography:

Gas liquified by pressure

EPA's RMP\*Comp(TM)

10

1.3

F

Urban

### Passive Mitigation Considered

Dikes:

Enclosures:

Berms:

Drains:

Sumps:

Other Type:

## Section 3. Toxics: Alternative Release

Toxic Alter ID: 61178

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Percent Weight:

Physical State:

Model Used:

Wind Speed (m/sec):

Atmospheric Stability Class:

Topography:

Gas

EPA's RMP\*Comp(TM)

1.5

D

Rural

### Passive Mitigation Considered

Dikes:

Enclosures:

Berms:

Drains:

Sumps:

Other Type:

### Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Neutralization:

Excess Flow Valve:

Flares:

Scrubbers:

Emergency Shutdown:

Other Type:

## **Section 4. Flammables: Worst Case**

No records found.

## **Section 5. Flammables: Alternative Release**

No records found.

## Section 6. Accident History

No records found.

## Section 7. Program Level 3

### Description

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The Process Safety Management Program applies to the entire closed-loop process.

### Program Level 3 Prevention Program Chemicals

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Prevention Program Chemical ID:	68512
Chemical Name:	Ammonia (anhydrous)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7

Prevention Program Level 3 ID:	46967
NAICS Code:	115114

### Safety Information

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Safety Review Date (The date on which the safety information was last reviewed or revised):	09-Dec-2008
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### Process Hazard Analysis (PHA)

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PHA Completion Date (Date of last PHA or PHA update):	10-Mar-2009
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### The Technique Used

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What If:	Yes
Checklist:	
What If/Checklist:	
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	01-Nov-2009

### Major Hazards Identified

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Toxic Release:	Yes
Fire:	Yes
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	Yes
Floods (Flood Plain):	

Tornado:  
Hurricanes:  
Other Major Hazard Identified:

## Process Controls in Use

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Vents:  
Relief Valves: Yes  
Check Valves:  
Scrubbers:  
Flares:  
Manual Shutoffs: Yes  
Automatic Shutoffs: Yes  
Interlocks:  
Alarms and Procedures: Yes  
Keyed Bypass:  
Emergency Air Supply:  
Emergency Power:  
Backup Pump:  
Grounding Equipment:  
Inhibitor Addition:  
Rupture Disks:  
Excess Flow Device:  
Quench System:  
Purge System:  
None:  
Other Process Control in Use: Microprocessor controls on compression units

## Mitigation Systems in Use

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Sprinkler System: Yes  
Dikes:  
Fire Walls:  
Blast Walls:  
Deluge System:  
Water Curtain:  
Enclosure:  
Neutralization:  
None:  
Other Mitigation System in Use:

## Monitoring/Detection Systems in Use

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Process Area Detectors: Yes  
Perimeter Monitors:  
None:  
Other Monitoring/Detection System in Use:

## Changes Since Last PHA Update

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Reduction in Chemical Inventory:  
Increase in Chemical Inventory: Yes  
Change Process Parameters:  
Installation of Process Controls:  
Installation of Process Detection Systems:

Installation of Perimeter Monitoring Systems:  
Installation of Mitigation Systems:  
None Recommended:  
None:  
Other Changes Since Last PHA or PHA Update:

## Review of Operating Procedures

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Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 24-Oct-2013

## Training

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Training Revision Date (The date of the most recent review or revision of training programs): 09-Dec-2008

## The Type of Training Provided

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Classroom:	Yes
On the Job:	Yes
Other Training:	Online

## The Type of Competency Testing Used

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Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

## Maintenance

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Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 09-Dec-2008

Equipment Inspection Date (The date of the most recent equipment inspection or test): 10-Mar-2009

Equipment Tested (Equipment most recently inspected or tested): Process - PHA walkthrough

## Management of Change

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Change Management Date (The date of the most recent change that triggered management of change procedures):

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 09-Dec-2008

## Pre-Startup Review

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Pre-Startup Review Date (The date of the most recent pre-startup review): 02-Dec-2008

## Compliance Audits

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Compliance Audit Date (The date of the most recent compliance audit): 04-Jan-2012

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 15-Jun-2012

## Incident Investigation

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Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

## Employee Participation Plans

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Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 09-Dec-2008

## Hot Work Permit Procedures

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Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 09-Dec-2008

## Contractor Safety Procedures

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Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 09-Dec-2008

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): 05-Mar-2009

## Confidential Business Information

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CBI Claimed:

## **Section 8. Program Level 2**

## Section 9. Emergency Response

### Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

### Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 20-Feb-2009

### Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 03-Nov-2008

### Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): City of Yuma Fire Department

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (928) 373-4850

### Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify): 29 CFR 1910.120(q)

## Executive Summary

YUMA EXPRESS COOLING, LLC

RISK MANAGEMENT PLAN LEVEL III

### 1 EXECUTIVE SUMMARY

- 1.1 Accidental Release Prevention And Emergency Response Policies.
- 1.2 General Description Of The Stationary Source And Regulated Substances.
  - 1.3 Summary Of The General Accidental Release Prevention Program and Chemical-Specific Prevention Steps
  - 1.4 Summary Of The Five-Year Accident History.
- 1.5 Summary Of The Emergency Response Program.
- 1.6 Planned Changes To Improve Safety.

#### 1.1 Accidental Release Prevention and Emergency Response Policies

The Yuma Express Cooling, LLC (YEX) Accidental Release Prevention and Emergency Response Policies are simply not to have accidental releases or emergencies. The company endeavors to execute these policies through the implementation of its Safety Program. The company safety program includes, but is not limited to a comprehensive Process Safety Management (PSM). The PSM program is executed through YEX's partner, Western Precooling Systems (WPS). WPS is a stakeholder in the YLLC operation and has offices and staff on-site. PSM is specifically designed and intended to prevent accidental releases. It is the primary goal of YEX and WPS to protect employees, visitors and neighbors from harm due to company operations.

YEX has adopted a non-responding facility policy; has an established Emergency Action Plan and has taken the steps necessary to be included in the community emergency plan. An Emergency Coordinator has been established and coordination with the State Emergency Response Commission (SERC), Local Emergency Planning Committee (LEPC) and Fire Department is performed on an ongoing basis. Emergency response pre-planning is coordinated and kept current through the annual submission of appropriate Reports and periodic tours of the facility by the Fire Department.

WPS policy includes maintaining appropriate emergency capabilities and to deal with emergencies safely if and when they do happen. Key WPS employees attend 1910.120 (q) Emergency Response training that is refreshed annually. Emergency equipment is maintained under the control of WPS.

Each company strives to execute its emergency response policies through skilled employees that are provided with adequate and appropriate equipment and training (production workers contracted by YEX are trained for their emergency actions. Refrigeration Technicians employed by WPS are trained for their emergency actions).

#### 1.2 General Description of the Stationary Source and Regulated Substances

The Yuma Express facility is located in Yuma, AZ in a commercial/industrial area outside the city. The facility provides refrigeration effect for the removal of field heat from freshly harvested vegetables (produce) and subsequent short-term refrigerated storage. The product that comes to the facility for pre-cooling and subsequent short-term storage is on-site generally four days from harvesting. The facility is a seasonally operated plant with product harvest periods beginning in mid-November and finishing in early April.

The refrigerant in use is Anhydrous Ammonia, CAS #7664-41-7, which is used in a closed-loop mechanical refrigeration system. Pressure and temperature controls are installed in accordance with appropriate standards, including isolation and overpressure relief valves. At certain times of the year portable cooling equipment is required to augment the fixed equipment at the facility. Due to the seasonal operation of the Plant, the refrigerant is removed and placed in storage vessels at the end of each season. The vessels are rated at higher pressure and temperature than the equipment it is transferred out of. The storage vessels are provided shade, traffic barriers and a water sprinkler system. The water sprinkler system reduces pressure and temperature by reducing the skin temperature of the vessels on very hot days in the Yuma area.

Operation of the facility is a coordinated effort. Yuma Express Cooling, LLC is an Arizona Limited Liability Company made up of Western Precooling Systems (WPS) - 50 % and a group of individuals and entities affiliated with American Growers Cooling LLC (AGCC) - 50 %. Yuma Express Cooling, LLC leases the site including stationary refrigeration equipment to AGCC. Separately,

WPS leases portable refrigeration equipment to AGCC. Maintenance of the entire refrigeration system is the responsibility of WPS which has offices and staff about 100 yards from the site. WPS and AGCC work together to implement the Risk and Process Safety Management Plan which is in the name of Yuma Express Cooling, LLC.

### 1.3 General Accidental Release Prevention Program and Chemical Specific Prevention Steps

#### Accidental Release Prevention Program

A comprehensive Process Safety Management (PSM) Program has been established in accordance with 29 CFR 1910.119. The PSM Program is specifically intended to prevent accidental releases & promote the safe operation of ammonia-handling equipment and processes. PSM is an integral part of daily Plant operation. The written PSM document is maintained in the site's RMP/PSM Plan.

As stated above, WPS is the company that maintains the ammonia refrigeration equipment at the site. WPS has developed comprehensive written procedures for the operation and maintenance of ammonia-handling equipment, including the steps to be taken in the event of a release or threatened release. The written procedures include necessary safety precautions for Plant operation, from installation and start-up to daily operation, to teardown and removal of portable equipment. As equipment maintenance needs are determined, the need is expressed at the workload meetings conducted by the WPS Area Manager. The specific repair task or upgrade for the expressed need is decided by the WPS Area Manager and entered into the work order system. Tasks are tracked through the work order system. Through this regular routine of inspect, discuss, assign and confirmation of completion, the facility has reduced equipment operational problems and also reduced the release potential.

WPS actively encourages its ammonia Technicians to seek Certification through the Refrigerating Engineers and Technicians Association (RETA). Technicians only perform tasks for which they have been pre-qualified.

#### Chemical-Specific Prevention Steps

It has become apparent in the industry that a mishap while draining oil from the system is one of the most common incidents to occur. Special self-closing valves are now used as a permissive for oil drain flow. If a release were to develop during the oil-draining task, the mechanic simply releases the handle of the self-closing valve and flow is terminated. The facility uses these types of valves at all oil drain points.

Other release prevention steps taken at Yuma Express Cooling, LLC:

- The facility is enclosed with fencing and gates to limit access to the facility and to increase the security of the facility from potential wrong-doers.
- Employees are trained for hazard communication (discovery and communicating) for releases, fires, vandals etc. Training is documented in each employees training record file.
- Staff is trained in the benefits of good housekeeping. The general appearance of the facility is maintained on a day-to-day basis.
- A Security Service is employed on-site to control casual visitors (truck drivers reporting to pick-up produce).
- There is a controlled pressure receiver installed for daily operational swing capacity.
- An evaporative cooling water sprinkler system has been installed over the receiver to reduce pressure during sustained hot weather.
- An ammonia monitoring, sensing and warning system is installed.
- WPS played a leading role instituting the Yuma-Area Ammonia Safety Day scheduled annually for November. Coolers, their personnel & numerous Fire Departments are included on the invitation list. Preventing, managing and responding to an ammonia emergency are regular topics. In this way, WPS has established relationships and a higher degree of coordination with Fire Departments that may be involved in ammonia response activities on an area-wide basis. WPS has been engaged with local emergency coordination efforts since February, 1994.
- Education and prevention of ammonia incidents is a primary focus of the Yuma Ammonia Safety Day. WPS and YLLC personnel attend these events on a regular basis.

### 1.4 Five-Year Accident History

There have been no qualifying accidental releases at the site over the last five years. There is no data to report.

### 1.5 The Emergency Response Program

The Emergency Response Program is divided into two elements, as only properly trained and qualified personnel are authorized to respond to emergencies. Production workers contracted by YLLC are trained to notify and evacuate via the Plant's Emergency Action Plan. Only the Yuma Fire Department (and other responding agencies via Mutual Aid Agreement) would respond to an emergency; support would be made available via WPS personnel trained to 29 CFR 1910.120(q) standards. Emergency equipment is maintained under the control of WPS. Written ammonia emergency response procedures are detailed in the facility's Thirty Minute Plan. Appropriate written plans are maintained on-site and updated on a regular basis. Local Emergency Response capabilities have been verified.

### 1.6 Planned changes to improve safety

The primary mechanisms to identify and plan safety improvements include (but are not limited to):

- Process Hazard Analysis revalidation/update;
- Compliance Audits;
- Routine maintenance (Mechanical Integrity Program);
- IIAR Bulletin 109 Inspections;
- WPS Inspection Protocol

Each of the Programs above may result in recommendations ranging from capital improvements to routine maintenance of the plant. Work Orders/Service Calls are established in parallel to identified needs. Current planned changes to improve safety are the result of a recent PHA Update and include:

- Upgrade portions of the Plant's SOP's (include additional details);
- PHA served as refresher regarding heightened awareness of security threats;
- Confirm (and adjust as necessary) liquid level controls on T-58 Accumulator;
- Check and re-torque Cooler Evaporator Hanger Bolts
- Check portable equipment for correct DOT Inspection Dates and visual placarding

All but one of the PHA recommendations were completed as of 5/01/2009. The one remaining recommendation is about 75% complete, was being delayed by an administrative computer system issue. The expected date of completion is 11/01/2009 (uploading of SOPs to a web-based solution).